

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE AMERICAN INTERNATIONAL GROUP,
INC. 2008 SECURITIES LITIGATION

Master File No.:
08-CV-4772-LTS-DCF

This Document Relates To: All Actions

**LEAD PLAINTIFF'S NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT AND APPROVAL OF NOTICE TO THE CLASS**

PLEASE TAKE NOTICE that Lead Plaintiff, State of Michigan Retirement Systems, as custodian of the Michigan Public School Employees' Retirement System, the State Employees' Retirement System, the Michigan State Police Retirement System, and the Michigan Judges Retirement System ("Lead Plaintiff"), and additional named plaintiffs Maine Public Employees Retirement System, Port Authority of Allegheny County Retirement and Disability Allowance Plan for Employees Represented by Local 85 of the Amalgamated Transit Union, Epstein Real Estate Advisory, Michael Conte and Randy Lewis Decker, on behalf of the proposed Class, respectfully move this Court for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, (a) preliminarily approving the proposed Settlement; (b) certifying the Class on a preliminary basis for purposes of Settlement; (c) approving the proposed form of Notice and Summary Notice; (d) approving the proposed methods of disseminating notice; (e) setting a date for the Settlement hearing; and (f) such other and further relief as this Court deems just and proper. Defendants do not oppose this motion.

Lead Plaintiff is contemporaneously filing a Memorandum in support of this Motion.

A [Proposed] Order Preliminarily Approving Proposed Settlement and Providing for Notice is submitted herewith.

Dated: September 12, 2014

Respectfully submitted,

BARRACK, RODOS & BACINE

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